

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of

PROMESA  
Title III

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
  
Debtors.<sup>1</sup>

Case No. 17-BK-03283-LTS  
  
(Jointly Administered)

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

PUERTO RICO SALES TAX FINANCING  
CORPORATION,

Debtor.

PROMESA Title III

No. 17 BK 3284-LTS

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**INFORMATIVE MOTION OF INTERNATIONAL UNION, UNITED AUTOMOBILE,  
AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA  
(UAW) AND SERVICE EMPLOYEES INTERNATIONAL UNION IN RESPONSE TO  
ORDER REGARDING PROCEDURES FOR ATTENDANCE, PARTICIPATION AND  
OBSERVATION OF JANUARY 16, 2019 HEARING [DKT. ENTRY NOS. 4647, 431]**

The International Union, United Automobile, Aerospace and Agricultural  
Implement Workers of America (UAW) (“UAW”) and Service Employees International Union  
 (“SEIU”) (together, the “Unions”) submit this informative motion in response to the Court’s

<sup>1</sup> The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

*Order Regarding Procedures for Attendance, Participation, and Observation of January 16, 2019, Hearing Regarding (1) The 9019 Settlement Approval Motion, (2) COFINA Plan of Adjustment Confirmation Motion, and (3) Dispute Regarding Section 19.5 of Plan* [Docket Entry Nos. 4647, 431] and respectfully state as follows:

1. Peter D. DeChiara, counsel for the Unions, will speak and present argument on behalf of the Unions at the January 16, 2019 hearing in connection with the following:

- (a) *Commonwealth of Puerto Rico's Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico Sales tax Financing Corporation* [Docket Entry No. 4067 in Case No. 17-3283];
  - (i) *Objection of Service Employees International Union and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) to Commonwealth of Puerto Rico's Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico Sales Tax Financing Corporation* [Docket Entry No. 4233 in Case No. 17-3283];
- (b) *Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* [Docket Entry No. 436 in case No. 17-3284];
  - (i) *Objection of Service Employees International Union and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) to COFINA Plan of Adjustment* [Docket Entry No. 4556 in Case No. 17-3283 and 395 in Case No. 17-3284].

2. The Unions expressly reserve the right to cross-examine any declarant concerning any additional exhibits that may be submitted relating to the above filings pursuant to the Court's January 9, 2019, Order.

3. Mr. DeChiara will appear in person in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

4. Mr. Miguel Simonet Sierra, local counsel for the Unions, and Mr. Alvin Velazquez, of SEIU's Legal Department, will also attend the January 16 hearing in San Juan, but do not seek to be heard.

**WHEREFORE**, the Unions respectfully request that the Court take notice of the foregoing.

Dated: January 10, 2019

Respectfully submitted,

/s/ *Peter D. DeChiara*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10th day of January 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification to all counsel of record of such filing.

Dated: January 10, 2019

/s/ *Peter D. DeChiara*  
PETER D. DECHIARA